

UNITED STATES DISTRICT COURT for the  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES,

Plaintiff,

v.

FRANK KNIGHT,

Defendant.

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NOTICE OF MOTION FOR  
PROBATION MATERIALS

Case no.: 23-cr-099

MOTION BY:

Barry J. Donohue, Esq., attorney for defendant  
FRANK KNIGHT.

DATE, TIME & PLACE:

Before the Honorable Jeremiah J. McCarthy, United  
States Magistrate Court Judge, Robert H. Jackson  
United States Courthouse, 2 Niagara Square,  
Buffalo, New York at a date, time and place to be  
set by the Court.

SUPPORTING PAPERS:

NOTICE OF MOTION AND SUPPORTING  
PAPERS OF PETER GERACE JULY 24, 2025  
[507].

RELIEF REQUESTED AND  
GROUNDS FOR RELIEF:

To join the motion of Peter Gerace [507] for an  
Order compelling the United States Probation  
Office to produce: (1) its file for Crystal Quinn for  
*in camera* review for exculpatory or impeachment  
material; and (2) the pretrial services and  
presentence reports for\_\_\_\_\_ and\_\_\_\_\_.

NATURE OF ACTION:

18 U.S.C. §371 (conspiracy to obstruct justice); 18  
U.S.C. §1001(a)(2) ((2) false statements to FBI).

Dated: July 28, 2025  
Erie County, New York

BARRY J. DONOHUE, ESQ.  
Attorney for plaintiff

By: /s/ Barry J. Donohue

Barry J. Donohue, Esq.  
77 Broad Street  
Tonawanda, New York 14150  
(716) 693-0359  
e-mail: [barry@donohuelaw.com](mailto:barry@donohuelaw.com)

To: Joseph Tripi, AUSA  
138 Delaware Avenue  
Buffalo, New York 14202  
(716) 843-5839  
e-mail: [joseph.tripi@usdoj.gov](mailto:joseph.tripi@usdoj.gov)

Nicholas Cooper, AUSA  
138 Delaware Avenue  
Buffalo, New York 14202  
(716) 843-5712  
e-mail: [nicholas.cooper@usdoj.gov](mailto:nicholas.cooper@usdoj.gov)

Casey Chalbeck, AUSA  
138 Delaware Avenue  
Buffalo, New York 14202  
(716) 843-5881  
e-mail: [casey.chalbeck@usdoj.gov](mailto:casey.chalbeck@usdoj.gov)